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September 13, 2023

BY ECF

The Honorable Jennifer H. Rearden
The U.S. District Court for the Southern District of New York
500 Pearl Street, Room 1920
New York, New York 10007

Re: *Donoghue et al. v. AMC Entertainment Holdings, Inc. et al.*
No. 23-cv-4985 (JHR) (VF) (S.D.N.Y. filed June 13, 2023)
Notice of Settlement and Request for Stay of Deadlines

Dear Judge Rearden:

I am special Section 16(b) litigation counsel to Nominal Defendant AMC Entertainment Holdings, Inc. ("AMC") in the action referred to above. The parties have entered into a stipulation of settlement resolving the action, a copy of which is enclosed herewith. I write to ask the Court to stay all deadlines in the case while the parties prepare the remaining settlement papers as described in this letter.

This is a stockholder action brought on AMC's behalf under Section 16(b) of the Securities Exchange Act of 1934 to recover so-called "short-swing" profit that the Defendants allegedly realized from trading in AMC's equity securities. While such actions are not subject to Rule 23.1 or Local Civil Rule 23.1.1, the parties intend to seek approval of their settlement to ensure it is final and res judicata. *See, e.g., Revive Investing LLC v. FBC Holdings S.A.R.L.*, No. 20 Civ. 618 (ALC) (GWG), 2021 U.S. Dist. LEXIS 2922, at *17 n.7 (S.D.N.Y. Jan. 7, 2021); *Chechele v. Elsztain*, No. 11 Civ. 3320 (SAS), 2012 U.S. Dist. LEXIS 191105, at *6-*7 (S.D.N.Y. Aug. 1, 2012). AMC anticipates filing a motion in the next week to 10 days to ask the

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Court to set a briefing schedule for a formal motion for settlement approval, to approve a form of notice to AMC's securityholders, and to set a date for a fairness hearing.

In the meantime, I respectfully ask that the Court stay all deadlines on the calendar, including the September 29, 2023 deadline for AMC and the Defendants to answer Plaintiffs' First Amended Complaint. All parties consent to this request.

Respectfully submitted,

/s/ James A. Hunter

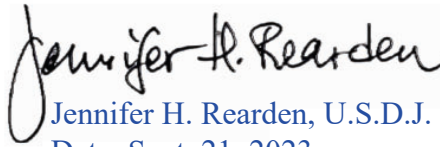
Enclosure

Copies by ECF:

All Counsel of Record

Application GRANTED.

SO ORDERED.


Jennifer H. Rearden, U.S.D.J.
Date: Sept. 21, 2023